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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

29 CALIFORNIA SPORTFISHING
30 PROTECTION ALLIANCE,

31 Plaintiff,

32 v.

33 PACIFIC BELL TELEPHONE COMPANY,

34 Defendant.

35 CASE NO. 2:21-cv-00073-JDP

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**NOTICE OF MOTION TO COMPEL
40 COMPLIANCE WITH SUBPOENA**

41 Judge: Hon. Jeremy D. Peterson

42 Complaint Filed: January 14, 2021

43 Zoom Hearing Date: November 9, 2023

44 Time: 10:00 a.m.

45 Courtroom: 9

1 **TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD:**

2 **PLEASE TAKE NOTICE** that on November 9, 2023, at 10:00 a.m., or as soon thereafter as
3 counsel may be heard via Zoom, Pacific Bell Telephone Company (Pacific Bell) will and hereby
4 does move for an order directing Below the Blue (BtB) to produce all documents called for by the
5 Subpoena that was served on August 9, 2023 within 14 days of the ruling on this motion. Pursuant
6 to Judge Peterson's Procedures for Civil Matters, “[t]he court will issue a minute order advising
7 counsel of the time and date of the conference. The Conference will be conducted via Zoom, and the
8 court will provide the parties with the login information.” Contact and other information for the Court
9 and the Courtroom Deputy is available at the following website:
10 <https://www.caed.uscourts.gov/CAEDnew/index.cfm/judges/all-judges/50231/>. A true copy of the
11 Subpoena is attached as Exhibit B to the Declaration of Navi Singh Dhillon.

12 Because BtB is headquartered in South Lake Tahoe, California, Pacific Bell files this Motion
13 to Compel in the Eastern District of California pursuant to Rule 45(d)(1).

14 This Motion is based upon the supporting Memorandum of Points and Authorities, the
15 Declarations of Hariklia Karis and Navi Dhillon, all pleadings and materials on file with the Court,
16 and all other matters presented to the Court before the Motion is taken under submission.

17 Respectfully submitted,

18 DATED: September 26, 2023

KIRKLAND & ELLIS

19 By: /s/ Hariklia Karis
20 HARIKLLIA “CARRIE” KARIS

21 Attorney for Defendant
22 PACIFIC BELL TELEPHONE COMPANY